

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing an Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208

**COMMENTS OF  
PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION**

**I. INTRODUCTION**

PCIA—The Wireless Infrastructure Association (“PCIA”) hereby submits these comments in response to the above captioned Federal Communications Commission (“FCC” or “Commission”) *Report and Order* and *Further Notice of Proposed Rulemaking* regarding Universal Service Fund (“USF” or “Fund”) and intercarrier compensation reform.<sup>1</sup> Consistent

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<sup>1</sup> *In re* Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund; WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337; CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109; WT Docket No. 10-208 *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011) (“*R&O and FNPRM*”).

with the public interest obligations for Phase I of the Mobility Fund, the Commission should continue to encourage the efficient use of wireless support structures.<sup>2</sup> Efficiencies are achieved when wireless providers share the underlying physical support structure for wireless antennas. Recognizing the array of regulatory restrictions imposed on wireless infrastructure, the Commission should require that Mobility Fund Phase II support recipients allow for reasonable collocation by other service providers on newly-constructed, Phase II-funded wireless support structures. However, the Commission should not impose additional, specific collocation practices, including a set number of collocation spaces.

## **II. PUBLIC INTEREST OBLIGATIONS FOR PHASE II MOBILITY FUND SUPPORT SHOULD ENCOURAGE THE EFFICIENT USE OF WIRELESS SUPPORT STRUCTURES**

In its *Report and Order*, the Commission acknowledged the benefits of advanced mobile services and their role in delivering consistent, high-speed broadband access across the country by establishing Phase I and Phase II of the Mobility Fund.<sup>3</sup> As part of Phase I, which is designed to support to spur the deployment of mobile voice and broadband networks to unserved areas, the Commission adopted several public interest obligations on support recipients, including “allow[ing] for reasonable collocation by other providers of services . . . on newly constructed towers that Mobility Fund recipients own or manage in the unserved area for which they receive support.”<sup>4</sup> Just as the Phase I collocation requirement will reduce the cost of deployment, speed build out and spur competitive entry into the market, so too will such a requirement impact beneficially Phase II’s ongoing support.

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<sup>2</sup> The phrase “wireless support structures” as used herein refers to all types of towers and other support structures constructed for the purpose of supporting antennas and other equipment for the provision of wireless services.

<sup>3</sup> See *R&O and FNPRM* at ¶¶301-478, 493-497.

<sup>4</sup> *Id.* at ¶376.

Efficiencies are achieved when wireless providers share the underlying physical support structure for wireless facilities, and ultimately collocation promotes the Commission's goals for improving coverage and competition across the country.<sup>5</sup> The Commission recognized as much in its 15th Mobile Wireless Competition Report when it found that "the ability of wireless service providers to lease space for new cell sites on established towers can ease and speed their entry into new geographic areas by eliminating the need to build a new tower."<sup>6</sup> Though the costs associated with deploying infrastructure can vary dramatically based upon individual factors such as the cost of land, local zoning processes, and the design of the structure to be built, PCIA members estimate that an average new build costs approximately \$250,000 to \$300,000 whereas an average collocation costs \$25,000 to \$30,000 to deploy.<sup>7</sup> The cost advantage of collocation is essential in reducing capital expenditures, thereby facilitating deployments necessary to increase a provider's coverage and capacity. This is particularly true for deployment in high-cost areas.

Furthermore, the Commission should allot the same flexibility for a Phase II collocation public interest obligation as it did for Phase I. In applying the collocation public interest requirement to Phase I, the Commission aptly recognized that mandating specific terms, conditions, or collocation spaces per structure "may unduly complicate efforts to expand coverage."<sup>8</sup> Wireless infrastructure siting decisions are a complex interplay between the technical and engineering requirements of the provider, and the state, local, and federal regulations governing wireless infrastructure siting. In fact, the Commission noted that

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<sup>5</sup> Comments of PCIA – The Wireless Infrastructure Association, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WE Docket No. 05-337; CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, at 3 (filed April 18, 2011).

<sup>6</sup> See *In re* Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, WT Docket No. 10-133, *Fifteenth Report*, FCC 11-103, ¶ 317 (rel. June 27, 2011) ("*Fifteenth Competition Report*").

<sup>7</sup> *Id.* at ¶312.

<sup>8</sup> *R&O and FNPRM* at ¶376.

“obtaining the necessary regulatory and zoning approvals from state and local authorities” is a “significant constraint[.]” to wireless infrastructure deployment.<sup>9</sup> Requiring Phase II recipients only “to construct towers where reasonable in a manner that will accommodate collocations,” the new Mobility Fund will capitalize on the benefits of collocation while allowing service and infrastructure providers to address the myriad, unique factors they must consider when siting and building new support structures.

### III. CONCLUSION

As described herein, to maximize competition, flexibility, and efficiencies, the Commission should require that recipients of Mobility Fund Phase II support allow for reasonable collocation by other service providers on newly-constructed, Phase II-funded wireless support structures.

Respectfully submitted,

PCIA – THE WIRELESS  
INFRASTRUCTURE ASSOCIATION

By: /s/

Michael T. N. Fitch  
President and CEO  
Jonathan Campbell  
Director, Government Affairs  
D. Zachary Champ  
Government Affairs Counsel  
Kara Leibin Azocar  
Policy Analyst

901 N. Washington Street, Suite 600  
Alexandria, VA 22314  
(703) 739-0300

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<sup>9</sup> *Fifteenth Competition Report* at ¶ 311.